

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

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ANNE POPE, et al., :  
Plaintiffs, :  
-against- : No. 11-cv-0736 (LEK) (CFH)  
COUNTY OF ALBANY, et al., :  
Defendants. :  
:-----x

**NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Partial Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, together with the Declaration of Mitchell A. Karlan in Support of Plaintiffs' Motion and the exhibits thereto; the Statement of Material Facts pursuant to the U.S. District Court for the Northern District of New York Local Rule 7.1(a)(3); and upon all prior papers and proceedings in this action, Plaintiffs Anne Pope, Wanda Willingham, Janis Gonzalez, Geraldine Bell, Samuel Coleman, and Lee Pinckney (collectively, the "Plaintiffs") move this Court for an order granting partial summary judgment, finding as a matter of law that: (1) the Black population in Albany County is sufficiently large and geographically compact to constitute five majority-minority districts, and (2) the Black population in Albany County is politically cohesive.

**PLEASE TAKE FURTHER NOTICE** that opposition papers, if any, to Plaintiffs' Motion, shall be served on or before April 16, 2013, and reply papers, if any, in further support of Plaintiffs' Motion, shall be served on or before April 22, 2013.

Dated: New York, New York  
March 26, 2013

Respectfully submitted,  
GIBSON, DUNN & CRUTCHER LLP

/s/ Mitchell A. Karlan  
Mitchell A. Karlan

mkarlan@gibsondunn.com  
200 Park Avenue  
New York, New York 10166-0193  
Telephone: 212.351.4000  
Fax: 212.351.4035  
Bar Roll No. 511874

DEROHANNESIAN & DEROHANNESIAN  
Paul DerOhannesian II  
derolaw@verizon.net  
677 Broadway, Suite 202  
Albany, New York 12207-2985  
Telephone: 518.465.6420  
Fax: 518.427.0614  
Bar Roll No. 104792

*Attorneys for Plaintiffs*